

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

FLOYD'S OF LEADVILLE, INC.,
N/K/A VALUED, INC.,

Plaintiff,

vs.

Case No.: 1:22-cv-03318-MKV

ALEXANDER CAPITAL, L.P., NESA
MANAGEMENT, LLC, JOSEPH ANTHONY
AMATO, ROCCO GERARD GUIDICIPIETRO,
JONATHAN GAZDAK, GREGORY HURLEY,
HOWARD DASILVA, RONALD BARRIE
CLAPHAM, MARK LEONARD, THIEN
TRUONG, PROVISION HOLDING, INC.,
TIMOTHY KELLY, and THREE DDD, LLC,

Defendants.

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**CONSENT MOTION FOR EXTENSION OF TIME TO RESPOND TO
PLAINTIFF'S COMPLAINT BY DEFENDANT GREGORY HURLEY**

Defendant Gregory Hurley, not represented by counsel, respectfully requests that the Court extend the time I have to respond to Plaintiff's Complaint to a response date no later than Howard da Silva who is also a Defendant, not represented. If the Court views this request as unreasonable, I then respectfully request that the Court extend the time to respond by 30 days to June 22, 2022. In support of this consent motion, I state as follows:

1. Plaintiff filed its Complaint on April 22, 2022

2. I, Gregory Hurley was served with a summons and copy of the Complaint on April 30, 2022.

3. I, Gregory Hurley am not represented by counsel.

4. Affidavits of Service does not appear to be filed for 2 Defendants, Howard da Silva, a U.K. resident nor Ronald Barrie Clapham.

5. I, Gregory Hurley am named in 4 of the 12 Counts of the Complaint. Defendant Howard da Silva is named in the identical 4 of 12 Counts of the Complaint.

6. I, Gregory Hurley, Defendant request this extension to allow me to adequate time to investigate and prepare a response to be filed on a date not later than Defendant Howard da Silva, individually or collectively, whether unrepresented, or through counsel if obtained.

7. I, Gregory Hurley, Defendant, if not granted an extension to file not later than the Defendant Howard da Silva, respectfully request an extension for 30 days to prepare my response to Plaintiff's Complaint to and including June 22, 2022.

Respectfully submitted, this 17th day of May 2022.

A handwritten signature in black ink, appearing to read "Gregory Hurley", written over a horizontal line.

Gregory Hurley, Defendant
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